

Industrial Pretreatment Quarterly

Published for Industrial Dischargers by the King County Industrial Waste Program



Volume XXIII Issue 1 March 2003

Mission Statement

The mission of the Industrial Waste Program is to protect the environment, public health, biosolids quality, and King County's regional sewerage system. We work cooperatively with our customers as we regulate industrial discharges, provide technical assistance, and monitor the regional sewerage system.

Industrial Waste Advisory Committee

Charles Cuniff, Environmental Coalition of South Seattle (ECOSS)
Ken Gross, GM Nameplate
Sandy Hallberg, Asko Processing
Donna Hoskins, Berlex Laboratories
Bill Hughes, Circuit Partners
Mike Jeffers, Envirotech Systems
Tom Raymond, Honeywell, Inc.
Steve Skodje, Cargill, Inc.
Doris S. Turner, Boeing Commercial Airplane Group – Renton
Chris VanHoof, City of Kent

The King County Industrial Waste Program salutes the 2002 Award and Recognition Program Awardees

(awarded in 2003 and listed here throughout that year)

Commitment-to-Compliance Award

Boeing Commercial Airplane – Renton
Circuit Services WorldWide LLC
Industrial Container Services, Inc.
Time Oil Company
Universal Sheet Metal, Inc.

KCIW Announces Award Winners in the 2002 Rewards and Recognition Program.

Each year, KCIW recognizes significant industrial users of the sewer system that have maintained an excellent record of compliance with rules and regulations for the previous calendar year. The winners are listed in the sidebars on pages 1, 2 and 3 of this newsletter. Industrial Waste honors companies with one or more of the following awards: EnvirOvation, Commitment-to-Compliance, Gold Certificate and Silver Certificate.

The **EnvirOvation Award**, with winner(s), announced in King County Earth Month (April), is given to companies that have voluntarily implemented an innovative pollution prevention strategy, significantly updated their pretreatment equipment or methods, significantly reduced their water use, or significantly reduced the amount of wastes being discharged to King County sewers. Candidates for this award can be self-nominated or nominated by KCIW. EnvirOvation Award winners for sets of two consecutive years become nominees for the King County Green Globe Leader in Industrial Waste Reduction Award, presented every other year.

The **Commitment-to-Compliance Award** honors companies that have received a Gold Certificate for five consecutive years. 2002 Commitment-to-Compliance Award winners will be honored at the King County Green Globe award ceremonies in King County Earth Month 2003.

To win the **Gold Award**, a company must have discharged wastewater during a minimum of 12 months of the calendar year from at least one of its sites and have no violations of any kind (discharge, permit, ordinance, reporting, self-monitoring, or King County monitoring).

The **Silver Award** recognizes companies that have had no King County monitoring violations, but have had a limited number of self-monitoring violations. The number of violations a company may have and still be eligible for the Silver Award depends on the

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Published by:

King County

Wastewater Treatment Division

Industrial Waste Program

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206-263-3000 <http://dnr.metrokc.gov/wlr/indwaste/>

KCIW News Briefs

KCIW Fee Changes

A number of the Industrial Waste Program's 2003 fees have increased or decreased, including: a 30% decrease in the cost of Minor Discharge Authorizations; new fees for the costs of Letters of Authorization, Enforcement Write-up; and No Further Actions. All renewals for Discharge Authorizations and Permits will now be charged the same fee as Permits. For a complete list go to <http://dnr.metrokc.gov/wlr/indwaste/fees.htm> or contact KCIW. (Contact information on page 1.)

KCIW has also added a Web page listing Post-Violation Fees, at <http://dnr.metrokc.gov/wlr/indwaste/postfees.htm>.

IWAC Meets

KCIW's Industrial Waste Advisory Committee (IWAC) will meet on these upcoming times in 2003: June 4; September 10; and December 3. Committee meetings are usually held from 9 a.m. to noon in Room 105 at 130 Nickerson Street (Canal Place office park), Seattle.

The meeting site is wheelchair accessible. Those who have needs or disabilities for which arrangements must be made ahead of time should get in touch with the Industrial Waste Program at least two weeks before a meeting. Telephone (206) 263-3000 (voice) or the Washington Relay Service at 1-800-833-6388 or e-mail kristin.painter@metrokc.gov.

For more information about the IWAC, go to <http://dnr.metrokc.gov/wlr/indwaste/iwac.htm>, or contact KCIW. (See article with December 2003 meeting on page 4.)

Seeking Industrial Waste Advisory Committee Members...

The Industrial Waste Advisory Committee is looking for two new members – one from the food processing industry and the other from a small sewer district. Members have a voice in how the Industrial Waste Program operates as well as exchanging ideas among the various wastewater dischargers, sewerage agencies, environmental groups and Industrial Waste staff.

The committee will meet no more than quarterly and will not require a lot of the members' time. If you are interested, please submit the following information by **May 1, 2003**:

- Name, title, company name, mailing address, e-mail address, and phone number;
- Type of industry;
- Why you would like to be on the committee

Please e-mail to barbara.badger@metrokc.gov or mail to Barbara Badger, Investigator, King County Industrial Waste Program, 130 Nickerson Street, Suite 200, Seattle, WA 98109-1658; Phone (206) 263-3024.

Gold Award

Alaskan Copper Works – 6th Ave.
Amgen Corporation
B.S.B. Diversified Company
Baker Commodities, Inc.
Ball Metal Beverage Container Corp.
Boeing Commercial Airplane – North Field
Boeing Commercial Airplane – Renton
Boeing Electronics Center
Boeing Integrated Defense Systems – Kent
Bunge Foods
Burlington Northern/
Santa Fe Railroad Company
Burlington Environmental – Kent
Carnitech US, Inc.
Circuit Partners, Inc.
Circuit Services WorldWide LLC
Circuits Engineering, Inc.
Coal Creek Development Corp. – Landmarc Technologies
Color Tech
Crane-Eldec Corporation – Martha Lake Facility
Crane-Eldec Corporation – North Creek Facility
Davis Wire Corporation
Emerald Recycling
Foss Maritime Company
GM Nameplate, Inc.
Green Garden Food Products, Inc.
I-90 Express Finishing
Industrial Container Services, Inc.
Industrial Plating Corporation
Interstate Brands Corp. – Hostess
Kenworth Truck Company – Renton
King County Road Services Division – Renton Decant Station
King County Solid Waste – Cedar Hills Landfill
Magnetic and Penetrant Services Company
Marine Vacuum Service
Mastercraft Metal Finishing, Inc.
Oberto Sausage Company – Airport Way
Pacific Iron & Metal
Pacific Metallurgical
Pepsi-Cola Company
Philip Environmental Services Corp.
Pioneer Human Services
Precor USA – Plant 1
Precor USA – Plant 2
Puget Sound Energy
Redhook Brewing Company

Gold Award *continued*

Rexam Beverage Can Company
Safeway, Inc. – Beverage Plant
Seattle Barrel Company
Seattle FilmWorks Manufacturing /
PhotoWorks, Inc.
Seattle Solid Waste – Kent
Highlands Landfill
Shasta Beverages
Skills, Inc. – Auburn Facility
Skills, Inc.
Smith Fabrication, Inc.
Stockpot, Inc.
Time Oil Company
Universal Brass, Inc.
Universal Sheet Metal, Inc.
Vectra Fitness
Vitamilk Dairy, Inc.
Western Pneumatic Tube
Western Processing Trust Fund II
Weyerhaeuser Company

Silver Award

A. O. Smith Water Products Company
Arco Petroleum Products Co. –
Seattle Terminal
Asko Processing
Cedar Grove Composting
Costco Wholesale
Electrofinishing, Inc.
Emerald Sanitary Services LLC
Flow International Corporation
Genie Industries – Bldg. 11 –
Canyon Park Plant
Genie Industries – Bldg. 3 & 4
Genie Industries – Bldg. 6 & 7 –
Scissors Plant
Glacier Northwest – Kenmore
Hytek Finishes
Northstar Beverage Company
Prototron Circuits, Inc.
Quality Finishing, Inc.
Siemens Medical Solutions USA –
Ultrasound Group
Surftech Finishes Company
Tri-Way Industries
Western Metal Arts

Industrial Pretreatment Tips

Do you have a question that KCIW can address in this column? Your suggestions are welcome. Please call Doug Hilderbrand at 206-263-3032, or email douglas.hilderbrand@metrokc.gov.

Counting Dangerous Wastes

The following article in appeared in the Department of Ecology's Winter 2003 edition of "Hazardous Waste Shoptalk."

Q. What does "counting" dangerous wastes mean?

A. "Counting" refers to calculating the total weight of dangerous waste generated during a calendar month, to determine generator compliance status.

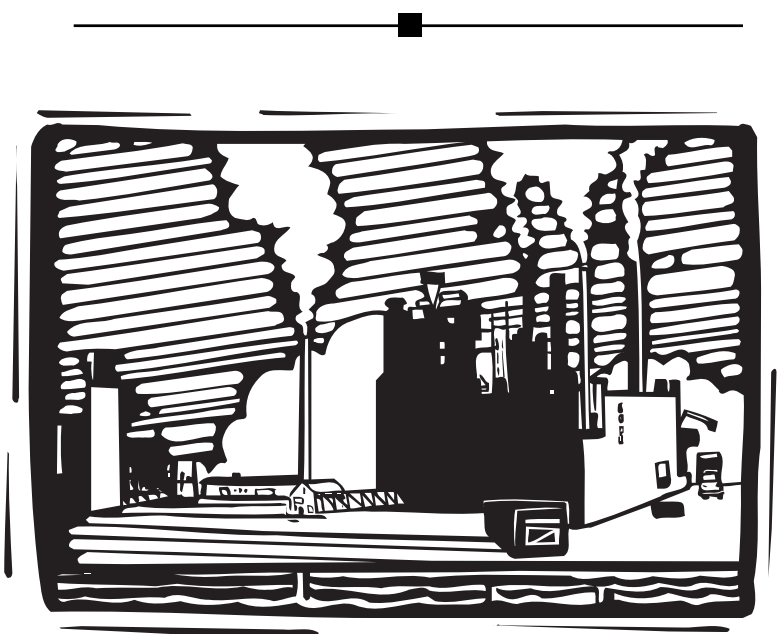
Q. Why must this be done?

A. The total weight of dangerous waste will determine whether a business is a small, medium, or large quantity generator. This in turn determines the actions that a business must take to comply with local, state, and federal requirements.

Q. What about waste that is recycled or treated? How about wastes that can go to a sewage treatment plant?

A. For the answer to these and other questions check out the newly revised publication Counting Dangerous Wastes Under the Dangerous Waste Regulations, or publication #98-414. It is available on:

Ecology's website at <http://www.wa.gov/programs/biblio/98414.html>. Or contact Ecology's Publication Distribution Center at (360) 407-7472.



EPA to issue final MP&M rule: New rule will probably not affect any facility in King County

On February 14, 2003, the Environmental Protection Agency's Administrator signed a final rule to establish wastewater controls for the Metal Products and Machinery (MP&M) industrial category. The MP&M regulation applies to about 2,400 facilities that generate oily wastewater. Unlike earlier versions of the proposed rule, the final rule will not affect industrial facilities that discharge waste water into publicly owned treatment plants.

Earlier versions of the proposed rule proposed to move some facilities covered by the EPA's pretreatment regulations for metal finishers into the rule. The EPA's decision not to make the proposed changes was largely due to efforts by industry and sewerage agencies such as King County. The county submitted data clearly showing the proposed rule would not actually be beneficial to the environment. It further demonstrated the high costs for industry and sewerage agencies that would be responsible for enforcing the rule.

The final rule that the EPA is issuing will establish limitations and standards only for facilities that directly discharge wastewater from oily operations in the Oily Wastes subcategory. This means the new rule will probably not affect any facility in King County.

If you would like to learn more about the final rule a fact sheet is available on the MP&M website at: <http://www.epa.gov/waterscience/guide/mpm/rule.html>. Previous articles in this newsletter about this ruling and KCIW's comments are posted on our website at http://dnr.metrokc.gov/wlr/indwaste/PTQ_9_02.pdf, or available by calling KCIW. (Contact information, page 1.)

The final rule and preamble are expected to appear in the Federal Register in approximately April 2003.



IWAC Meeting Held December 4, 2002.

1. Announcements: Facilitator and KCIW Water Quality Staff Engineer Bruce Tiffany announced that, beginning in 2003, the IW contact person for the IWAC will be Barbara Badger.

2. Water Reuse in King County/Sammamish Valley Interceptor Project:

Tom Fox, Water Reuse Coordinator for King County, gave a presentation on the Sammamish Valley Interceptor project and emerging technologies for producing reclaimed water.

King County is designing a reclaimed water production facility in the Sammamish Valley. This facility will produce between 1 million and 3 million gallons per day of reclaimed water, which is wastewater that gets treated to such a high level that it can be used safely and effectively for non-drinking water uses. Reclaimed water is available year-round, even during dry summer months or when drought conditions can strain other water resources. The water produced here will be used for irrigation in the Sammamish Valley.

A number of alternative technologies were evaluated for the Sammamish Valley facility, with membrane bioreactor technology being selected as one of the fundamental treatment processes. Membrane bioreactors can produce a high quality effluent while utilizing a much smaller footprint than conventional wastewater treatment technologies. Another potential benefit of the Sammamish Valley facility is that it will provide a couple of years of operation and maintenance experience with membrane bioreactors prior to design of the proposed Brightwater wastewater treatment plant. The membrane bioreactor process is an emerging technology given serious consideration for use at Brightwater.

Construction will take place in 2003 and 2004. If no unforeseen obstacles are encountered, reclaimed water will be available for irrigation in 2004.

3. Industrial Waste Program Sample Splitting Procedure:

KCIW Supervising Compliance Investigator Denise Healy and Compliance Specialist Tammy Himes provided input on the Industrial Waste Program sample splitting procedure. Tammy demonstrated how samples are "split" between the Industrial Waste Program and industrial dischargers. Tammy emphasized the importance of proper

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frequency of its required self-monitoring and the duration of its discharge as shown in the table below.

Self-Monitoring Frequency	Number of Samples Per Year In Violation
Monthly	1
Bimonthly	2
Weekly	3
Daily	4

Self-Monitoring Frequency	Number of Samples Per Year In Violation
Monthly	0
Bimonthly	0
Weekly	1
Daily	2

Companies were ineligible for either the Gold or Silver Award if they discharged for less than six months of the year or did not have a waste discharge permit for all of 2000. A company with a violation resulting in significant noncompliance or monetary penalties is ineligible for the Silver Award. Self-monitoring must be of a type other than flow monitoring or polar FOG monitoring to be eligible for an award.

Gold or Silver Award winners also receive their awards in King County Earth Month (April). If you have any questions about the Rewards and Recognition Program, please call Kristin Painter at (206) 263-3002.

Ecology Says toxic cleanup workload continues to grow

A new Washington State Department of Ecology (Ecology) report, "State of Cleanup," indicates that the toxic cleanup workload continues to grow in the state.

The report reviews Washington's toxic-cleanup efforts since voters adopted the innovative Model Toxics Control Act (MTCA) by initiative in 1988, establishing a formal process for cleaning up contaminated sites in Washington.

Although the agency has cleaned up 5,017 toxic sites in Washington over the past 14 years, more than 500 new sites were identified in 2001, compared to 479 the year before.

Jim Pendowski, toxic-cleanup manager for Ecology, said the report's findings are prompting the department to re-evaluate where employees should prioritize their time and where money should be concentrated.

The report also outlines challenges on the horizon for the cleanup program as well as offering keys to more-permanent cleanup solutions, such as an approach that would further stop contamination at its source, steadily continue cleanup efforts, and improve the connection and communication among state agencies, local governments and communities.

"When the cleanup program began, an assumption was made that, with time and steady cleanup, it would become obsolete and put itself out of business," explained Pendowski, toxic-cleanup manager for Ecology. "But Washington's past industrial legacy is broader than we imagined, and it looks like we'll be busy for many years to come."

The report is available online at <http://www.ecy.wa.gov/biblio/0209043.html>.



Industrial Waste Fees Set for 2003

Fees charged to industrial users for the types of waste they discharge to the county sewer system supply approximately 50% of the KCIW budget; plus pay for the costs that our treatment plants incur for treating high strength industrial waste. The King County sewage-treatment fee pays for the remainder. Each year, KCIW reviews all of these fees. Our intent is to recover just what it costs to operate the fee programs. The table below compares our 2002 fees with those for 2003. (For additional information about 2003 fees go to <http://dnr.metrokc.gov/wlr/indwaste/fees.htm>.)

Surcharges: At KCIW, we recover the costs for treating high-strength wastewater by applying a surcharge to wastes that have a biochemical oxygen demand greater than 300 mg/l (milligrams per liter) and total suspended solids greater than 400 mg/l. The surcharge includes an administrative charge that covers costs of sampling, analysis, inspection,

and billing high-strength dischargers.

Monitoring discharges: We also recover costs for monitoring discharges for heavy metals and fats, oils, and grease. Charges cover all costs of inspecting and sampling companies with such discharges.

The **post-violation program** is designed to recover inspection and monitoring costs from out-of-compliance facilities. Because violating companies require more attention than companies in compliance, post-violation fees put the economic burden on companies that cause the extra costs.

KCIW also recovers costs for inspecting and drafting permits and discharge authorizations.

The unit charges of fees shown on the table are affected by several factors, including the following year's predicted expenditures and the previous year's actual expenditures.

A Comparison of 2002 Fees with 2003 Fees		
	2002 Fees	2003 Fees
High Strength Surcharge		
Biochemical Oxygen Demand (BOD)	\$0.165329/pound	\$0.176434/pound
Total Suspended Solids (TSS)	\$0.273683/pound	\$0.258323/pound
Monitoring Charges		
Heavy metals	\$0.001134/gallon	\$0.001272/gallon
Fats, Oils, and Grease	\$0.000185/gallon	\$0.000195/gallon
Permit Fees		
Waste Discharge Permit	\$1,830.00	\$1,885.00
Discharge Authorization		
Major – New	\$1,200.00	\$1,335.00
Major – Renewal	\$900.00	\$1,335.00
Minor – New	\$900.00	\$690.00
Minor – Renewal	\$900.00	\$690.00
Letter of Authorization	N/A	\$130.00
Post Violation Fees		
Metals Grab	\$120.00	\$130.00
Metals Composite	\$280.00	\$250.00
pH Grab	\$110.00	\$120.00
pH Continuous (Installation)	\$100.00	\$100.00
pH Continuous (Per week of operation)	\$100.00	\$100.00
FOG Set	\$305.00	\$320.00
VOA Grab	\$260.00	\$270.00
VOA Composite	\$370.00	\$390.00
BNA Grab	\$405.00	\$415.00
BNA Composite	\$565.00	\$535.00
Cyanide Grab	\$160.00	\$155.00
Cyanide Composite	\$280.00	\$275.00
Mercury Grab	\$130.00	\$140.00
Mercury Composite	\$290.00	\$260.00
BOD	\$310.00	\$280.00
TSS	\$280.00	\$250.00
Enforcement Write-Up No Further Action	N/A	\$225.00
Enforcement Action	\$865.00	\$620.00
Inspection	\$225.00	\$225.00

sample collection and preservation. Several members of the IWAC felt that this kind of information should get out to some of the industrial dischargers who may not be aware of the importance of proper sample collection and preservation.

The Industrial Waste Program will work on emphasizing to the industrial dischargers the importance of sample collection/preservation and will conduct outreach with industrial dischargers on how to work with their analytical laboratory.

4. Open Discussion: Washington State Department of Ecology General Permit for Industrial Stormwater and Implications for the Industrial Waste Program:

KCIW Program Manager Elsie Hulsizer and Bruce Tiffany led a discussion of the new industrial

stormwater permit from the Department of Ecology. The 2000 permit was rescinded and a new permit was issued because of a lawsuit. This new permit differs in that attainment of benchmark values will be required as well as implementation of best



management practices (BMPs). The 2000 permit did not require sampling. The new permit will require quarterly sampling along with submission of stormwater pollution prevention plans (SWPPPs).

Several of the parameters in the new permit have very low benchmark values. One of the goals of this five-year permit cycle is to collect some "real world" data from industrial facilities in order to get a more accurate assessment of environmental impacts. Because discharge to the sanitary sewer could give industrial dischargers relief from Ecology's stormwater permit, the Industrial Waste Program is concerned about increasing pressure to accept contaminated industrial stormwater.

Publication of recent enforcement actions

This publication reports companies that were the subject of enforcement actions during the period of December 2002 through February 2003 (or have not been published previously) and their violations met one or more of the following criteria:

- Were found in significant noncompliance during the reporting period;
- Received fines; or
- Had violations that were unique or warrant special attention.

Companies Found with Significant Noncompliance

Company	Nature of Violation/ Type of Pollutant	Basis for Significant Noncompliance	Penalty	Comments
Arctic Ice Cream Novelties 1901 23rd Ave S. Seattle, WA 98144	Late Report	Arctic Ice Cream Novelties failed to submit a monthly self-monitoring report within 30-days of the due date.	Final Notice	Arctic Ice Cream filed the report, no further action was required.

In addition to the above actions, King County Industrial Waste also issued enforcement actions for the following: Acidic pH (3), Code violation-discharge

of material that can cause an obstruction (1); Copper (1); Final notice for late report (1); Lead (1).

Hazardous Waste Notification Requirement

In 1990 the United States Environmental Protection Agency (EPA) added a notification requirement to the General Pretreatment Regulations (40 CFR 403). In 1993 KCIW sent letters to all of its permitted industrial users informing them of this under-publicized hazardous waste notification requirement.

Almost ten years later this reporting requirement may have been forgotten by almost everyone except the agencies responsible enforcing it!

The application for a King County waste discharge permit or discharge authorization includes a section for listing all of the chemicals used on site that may be discharged to the sewer. If, on behalf of their company or agency, a business has filed such an application since 1990, and it has not added any chemicals that are not listed in its application, then the business need not worry about this notification requirement.

If, however, the business has added a chemical or chemicals that meet the following definition, it needs to file the hazardous waste form within 180 days of the discharge: "A substance, which, if

otherwise disposed of, would be a hazardous waste under 40 CFR part 261." Businesses can obtain the form from KCIW.


This is a one-time notification for each chemical. If this is part of an ongoing process, businesses should amend their applications to KCIW.

(The preceding is a brief summary of this requirement. Please refer to 40 CFR 403.12(p) for the complete text to ensure compliance. KCIW will mail or fax a copy of this form. Please call (206-263-3000.)

**This information is available on
advance request in accessible formats for
persons with disabilities.**

**Please call 206-263-3000 or TTY relay
service at 1-800-833-6388.**

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